

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GUY CARPENTER & COMPANY, LLC and :
MARSH & MCLENNAN COMPANIES, INC., :
Plaintiffs, : Hon. Denise Cote
-against- :
JULIAN SAMENGO-TURNER, RON WHYTE, :
and MARCUS HOPKINS, :
Defendants. :
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**AFFIDAVIT OF ROBERT A. ALESSI, ESQ. IN SUPPORT OF
THE INTEGRO NON-PARTIES' MOTION TO QUASH OR,
IN THE ALTERNATIVE, MODIFY DEPOSITION SUBPOENAS**

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

ROBERT A. ALESSI, being duly sworn, deposes and says:

1. I am a member of the law firm of Cahill Gordon & Reindel LLP, counsel for non-parties Integro USA Inc. ("Integro"), Roger Egan and John Clements (collectively, the "Integro Non-Parties"). I respectfully submit this Affidavit in support of the Integro Non-Parties' Motion to Quash or, in the Alternative, Modify Deposition Subpoenas.

2. Annexed hereto as **Exhibit 1** is a copy of a June 20, 1997 *Financial Times UK* article.

3. Annexed hereto as **Exhibit 2** is a copy of a January 31, 2005 press release issued by the New York Attorney General, published at http://www.oag.state.ny.us/press/2005/jan/marshsettlement_pr.pdf.

4. Annexed hereto as **Exhibit 3** is a copy of May 6, 2005 press release issued by Integro.

5. Annexed hereto as **Exhibit 4** is a copy of a February 13, 2007 press release issued by Marsh & McLennan Companies, Inc.

6. Annexed hereto as **Exhibit 5** is a copy of plaintiffs' May 4, 2007 Complaint (excluding the exhibits thereto) in the above-captioned action.

7. Annexed hereto as **Exhibit 6** is copy of a transcript of the May 8, 2007 Marsh & McLennan Companies, Inc. Earnings Conference Call. (Page numbers have been added to this exhibit for the Court's convenience.)

8. Annexed hereto as **Exhibit 7** is a copy of plaintiffs' May 15, 2007 Memorandum of Law in Support of Their Motion for Expedited Discovery.

9. Annexed hereto as **Exhibit 8** is a copy of the May 15, 2007 Declaration of Robert N. Holtzman in support of plaintiffs' May 15, 2007 motion for expedited discovery.

10. Annexed hereto as **Exhibit 9** is a copy of the Court's May 24, 2007 Order.

11. Annexed hereto as **Exhibit 10** is a copy of a May 30, 2007 UBS Investment Research Risk Manager Survey.

12. Annexed hereto as **Exhibit 11** is a copy of the June 19, 2007 Order entered by Her Majesty's Court of Appeal in London, England, in the pending English proceeding related to the above-captioned action.

13. Annexed hereto as **Exhibit 12** is a copy of the June 20, 2007 Notice of the scheduling of a July 6, 2007 oral argument before Her Majesty's Court of Appeal in London, England, in the pending English proceeding related to the above-captioned action.

14. Annexed hereto as **Exhibit 13** is a copy of a June 20, 2007 letter from the Integro Non-Parties' counsel to plaintiffs' counsel.

15. Annexed hereto as **Exhibit 14** is a copy of a June 21, 2007 letter from the Integro Non-Parties' counsel to plaintiffs' counsel.

16. Annexed hereto as **Exhibit 15** is a copy of a June 27, 2007 letter from the Integro Non-Parties' counsel to plaintiffs' counsel.

17. Annexed hereto as **Exhibit 16** is a copy of a June 27, 2007 article from *The Insurance Insider*.

18. Annexed hereto as **Exhibit 17** is a copy of plaintiffs' June 28, 2007 deposition subpoena for non-party Roger Egan.

19. Annexed hereto as **Exhibit 18** is a copy of plaintiffs' June 28, 2007 deposition subpoena for non-party John Clements.

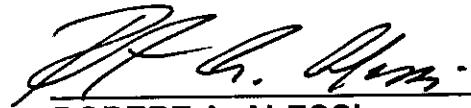
20. Annexed hereto as **Exhibit 19** is a copy of the Court's July 2, 2007 Order.

21. Annexed hereto as **Exhibit 20** is a copy of a July 3, 2007 *BestWire Services* article.

22. Annexed hereto as **Exhibit 21** is a copy of the July 3, 2007 Affidavit of non-party Roger Egan.

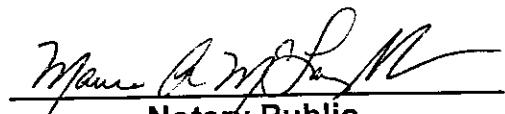
23. Annexed hereto as **Exhibit 22** is a copy of the July 3, 2007 Declaration of non-party John Clements.

24. I have several prior-scheduled professional commitments during the remainder of this month, including, but not limited to, the week of July 9, 2007. In addition, I am scheduled to be away from my office during the first two weeks of August 2007.



ROBERT A. ALESSI

**Sworn to before me this
5th day of July, 2007**



Notary Public

MAURA A. McLAUGHLIN
Notary Public, State Of New York
No. 02MC6058965
Qualified in Queens County
Commission Expires May 21, 2011